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FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

2002 JAN 28 A 9:38

DEPT. OF BALTIMORE

January 9, 2002

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Offices In  
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Virginia

*Need tel. conf*  
*Done* ↓

*1/25/02  
3:30 pm*

**VIA HAND-DELIVERY**

The Honorable Benson E. Legg  
United States District Court  
for the District of Maryland  
Third Floor, Room 340  
101 W. Lombard Street  
Baltimore, MD 21201

Re: In the Matter of the Complaint of  
Eternity Shipping Ltd., et al.  
for Exoneration from or Limitation of Liability  
Civil Action #: L-01-CV-0250

Dear Judge Legg:

This letter will report on the teleconference among all counsel which took place yesterday evening at the appointed time, while your Honor was unavoidably detained in Court.

Counsel had the opportunity to discuss in some detail the extent of the discovery that appears likely to be necessary in this case, and it was agreed that the schedule originally proposed in my letter of January 2, 2002 appears to be overly optimistic, particularly given the need to accommodate the schedules of at least five different sets of lawyers and the likelihood of overseas travel.

All counsel have now agreed to request that the Court enter a supplemental Scheduling Order containing the following deadlines, which we discussed and agreed to yesterday evening:

1. Moving for joinder of additional parties and amendment of pleadings  
– April 8, 2002

APPROVED THIS

DAY OF

*25th*

*January, 2002*

*Benson Legg*  
BENSON EVERETT LEGG, U.S.D.J.

*(21)*

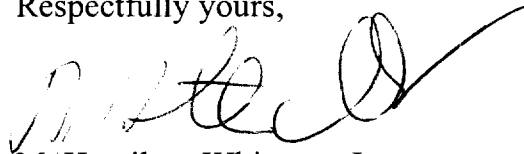
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2. Completion of factual discovery, exchange of initial expert disclosures (all parties) and submission of status report – October 8, 2002
3. Exchange of rebuttal/responsive expert disclosures (all parties) – November 8, 2002
4. Filing of dispositive motions – December 8, 2002
5. Completion of expert discovery – February 8, 2003

We appreciate your Honor's attention and consideration in the handling of this rather complex matter. If your Honor has any concerns about the proposed schedule or otherwise desires to reconvene yesterday's telephone conference, I will be happy to set up another conference call.

Respectfully yours,



M. Hamilton Whitman, Jr.

MHWjr/pkp

cc: (via facsimile and first class mail)  
Jeffrey J. Asperger, Esquire  
James D. Skeen, Esquire  
W. Charles Bailey, Jr., Esquire  
R. Blake Brunkenhoefer, Esquire  
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